

Exhibit 02

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NIKE, INC.,

Plaintiff,

v.

S2 SERVICES, INC. F/K/A S2, INC.;
SURGEON WORLDWIDE, INC.;
DOMINIC CHAMBRONE A/K/A
DOMINIC CIAMBRONE; AND
DALLAS IMBIMBO,

Defendants.

Case No. 1:24-cv-05307-NRB

**DEFENDANT AND
COUNTERCLAIM PLAINTIFF
SURGEON WORLDWIDE, INC.’S
INTERROGATORIES, SET ONE,
TO NIKE, INC.**

SURGEON WORLDWIDE, INC.;
DOMINIC CHAMBRONE A/K/A
DOMINIC CIAMBRONE; AND
DALLAS IMBIMBO,

Counterclaim-Plaintiffs,

v.

NIKE, INC.,

Counterclaim-Defendant.

PROPOUNDING PARTY: SURGEON WORLDWIDE, INC.

RESPONDING PARTY: NIKE, INC.

SET NUMBER: ONE

each and every instance of such tarnishment, i.e. any time(s) DEFENDANTS' goods/services have been considered anything other than prestige and high-quality.

INTERROGATORY NO. 14:

IDENTIFY who at NIKE or working on YOUR behalf participated in any way in conceiving, ideating, drafting, putting together, revising, finalizing, or conveying any part of the defamatory statement alleged in Paragraphs 8, 10, 104, and 128 of the COUNTERCLAIMS (i.e. the statement accusing DEFENDANTS *inter alia* of “constructing counterfeit ‘Nike’ footwear from scratch and selling it as officially branded Nike product” and “teaching others to create counterfeit ‘Nike’ sneakers”), including at least each PERSON’s title and when/how they were involved, regardless of whether each such PERSON was involved with only one or more activities, e.g.: (1) coming up with the idea for any part of the statement, (2) formulating the language of any part, (3) planning to disseminate the statement; or (4) publishing any part of the statement to anyone within our outside of NIKE.

INTERROGATORY NO. 15:

IDENTIFY all COMMUNICATIONS outside of NIKE that YOU or anyone working on YOUR behalf have had RELATING TO any part of the defamatory statement alleged in Paragraphs 8, 10, 104, and 128 of the COUNTERCLAIMS, including by describing who NIKE or anyone acting on YOUR behalf communicated to (including at least such PERSON’s title and company), when/how the COMMUNICATION was made, and why it was made.

INTERROGATORY NO. 16:

Describe the earned media value to NIKE for each of DEFENDANTS' CUSTOMIZATIONS or CUSTOMIZING projects involving NIKE's products or partners (e.g. athletes, celebrities, influencers, and other public figures)—including but not limited to those highlighted in the COUNTERCLAIMS, such as from Usher's CUSTOM shoes for the 2024 Super Bowl—with any related internal measurements, calculations, or analytics (e.g. as to reach, engagement, sentiment, etc.), IDENTIFY any and all PERSON(S) with knowledge thereof, and IDENTIFY any and all DOCUMENTS RELATING TO each project's earned media value.

INTERROGATORY NO. 17:

IDENTIFY each and every PERSON whom NIKE contends may have engaged in infringement or counterfeiting for which DEFENDANTS may be contributorily liable, as alleged in Count III and Count IV of the COMPLAINT.

Dated: January 8, 2025

/s/ Meredith L. Williams

Michel D. Adams
madams@rutan.com
Meredith L. Williams
mwilliams@rutan.com
Rutan & Tucker LLP
18575 Jamboree Road, 9th Floor
Irvine, California 92612
Telephone: (714) 641-5100

Zakari A. Kurtz
zak@sneakerlawfirm.com
Sneaker Law Firm PLLC dba
Sneaker & Streetwear Legal Services
928 Washington Str.
Baldwin, NY 11510
Telephone: (540) 230-2965

Michael R. Yellin
myellin@colescotz.com
Cole Schotz P.C.
1325 Avenue of the Americas
19th Floor
New York, New York 10019
Telephone: (212) 752-8000

Attorneys for Defendants
S2 SERVICES, INC. F/K/A S2,
INC.; SURGEON WORLDWIDE,
INC., DOMINIC CHAMBRONE
A/K/A DOMINIC CIAMBRONE,
AND DALLAS IMBIMBO

and

Counterclaim- Plaintiffs
SURGEON WORLDWIDE, INC.,
DOMINIC CHAMBRONE A/K/A
DOMINIC CIAMBRONE, and
DALLAS IMBIMBO

CERTIFICATE OF SERVICE

(*Nike, Inc. v. S2, Inc d/b/a The Shoe Surgeon, et al.*
USDC SDNY Case No.. 1:24-CV-05307)

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 18575 Jamboree Road, 9th Floor, Irvine, CA 92612. My electronic notification address is mwilliams@rutan.com.

On January 8, 2025, I served on the interested parties in said action the within: **DEFENDANT AND COUNTERCLAIM PLAINTIFF SURGEON WORLDWIDE, INC.'S INTERROGATORIES, SET ONE, TO NIKE, INC.** as stated below:

Tamar Y. Duvdevani
 Marc E. Miller
 Joshua Schwartzman
 Gabrielle Chasin Velkes
 DLA PIPER LLP (US)
 1251 Avenue of the Americas, 27th Fl.
 New York, New York 10020-1104
 Email:
tamar.duvdevani@us.dlapiper.com
marc.miller@us.dlapiper.com
joshua.schwartzman@us.dlapiper.com
gabrielle.velkes@us.dlapiper.com
valerie.ruppert@us.dlapiper.com

Attorneys for Plaintiff
 Nike, Inc.

Zakari A. Kurtz
 SNEAKER LAW FIRM PLLC, dba
 SNEAKER & STREETWEAR LEGAL
 SERVICES
 928 Washington St.
 Baldwin, NY 11510
 Email: zak@sneakerlawfirm.com

Attorney for Defendants
 S2, Inc. d/b/a The Shoe Surgeon,
 Surgeon Worldwide, Inc.,
 Dominic Chambrone aka Dominic
 Ciambrone and Dallas Imbimbo

Michael R. Yellin
 Cole Schotz, P.C.
 1325 Avenue of the Americas, 19th Floor
 New York, New York 10019
 Email: myellin@coleschotz.com

Attorney for Defendants
 S2, Inc. d/b/a The Shoe Surgeon,
 Surgeon Worldwide, Inc.,
 Dominic Chambrone aka Dominic
 Ciambrone and Dallas Imbimbo

☒ (BY E-MAIL) Pursuant to agreement of the parties as the preferred method of service, a copy of the foregoing document(s) was transmitted to the e-mail

addresses set forth above.

Executed on January 8, 2025, at Irvine, California.

I declare under penalty of perjury that the foregoing is true and correct.

Meredith L. Williams

(Type or print name)

/s/ Meredith L. Williams

(Signature)